



OPERATING PERMIT (Conditional Major) Issued Pursuant to Tennessee Air Quality Act

Date Issued:

Permit Number:

456018F

Date Expires: April 1, 2013

Issued To:

Installation Address:

Rogers Group, Inc.

2212 Bethel Rd, Hwy 166 So.
Pulaski

Installation Description:

01 Batch Mix Asphalt Plant
with Cyclone & Baghouse Controls
and Asphalt Recycle Capability.

Emission Source Reference No.

28-0011-01

Modification: No.4 fuel oil usage added.

NSPS

The holder of this permit shall comply with the conditions contained in this permit as well as all applicable provisions of the Tennessee Air Pollution Control Regulations.

Conditions:

1. The application that was utilized in the preparation of this permit is dated **December 19, 2002** and is signed by **Van Medlock**, Environmental Engineer for the permitted facility. If this person terminates employment or is reassigned different duties and is no longer the responsible person to represent and bind the facility in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification shall be in writing and submitted within thirty (30) days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the facility in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements and covenants. This permit does not cover any air contaminant source that does not conform to the conditions of this permit and the information given in the approved application.

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TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

NON-TRANSFERABLE

POST AT INSTALLATION ADDRESS

GENERAL SECTION

2. The Permittee has elected to opt-out of being issued a major source operating permit pursuant to Division Rule 1200-3-9-.02(11)(a). The Permittee would be considered a major source because their "potential to emit" values for **particulate matter, sulfur dioxide, carbon monoxide, and nitrogen oxides** were greater than **100 tons per year** each at the time of application. The Permittee has agreed to be subject to limitations in order to be below the major source applicability thresholds for **particulate matter, sulfur dioxide, carbon monoxide, and nitrogen oxides** of **100 tons per year** each.
3. Any non compliance with any condition(s) of this permit set to restrain the "potential to emit" below the applicability thresholds of 1200-3-9-.02(11) of the Tennessee Air Pollution Control Regulations, shall be reported in writing to the Technical Secretary within fifteen (15) working days of such discovery. This notification, at a minimum, shall include the identification of the source(s), identification of the permit condition(s) violated and details of the non-compliance.
4. Should proof of compliance for the pollutant(s) with emission limitations placed on this permit be required, the emissions measuring test method(s) and procedure(s) are the following:

Pollutant or Parameter	Testing Methodology
Sulfur Dioxide	EPA Method 6 as published in the current 40 CFR 60, Appendix A
Particulate Matter	EPA Method 5 as published in the current 40 CFR 60, Appendix A
Carbon Monoxide	EPA Method 10 as published in the current 40 CFR 60, Appendix A
Nitrogen Oxides	EPA Method 7 as published in the current 40 CFR 60, Appendix A
Sulfur Content of Fuels	EPA Method 19 as published in the current 40 CFR 60, Appendix A

5. Routine maintenance, as required to maintain specified emission limits, shall be performed on the air pollution control devices. Maintenance records shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than five (5) years.
6. The source controlled by the air pollution control device shall not operate unless the control device is in operation. In the event a malfunction/failure of this control device occurs, the operation of the process controlled by this control device shall be regulated by the provisions of Chapter 1200-3-20 of the Tennessee Air Pollution Control Regulations.
7. Emissions from roads and parking areas shall not exhibit greater than ten (10) percent opacity utilizing Tennessee Visible Emissions Evaluation (TVEE) Method 1.
- This condition is established pursuant to Rule 1200-3-8-.01(1) of the Tennessee Air Pollution Control Regulations.
8. Fugitive emissions from this source shall be controlled as specified in Rule 1200-3-8-.01. Specifically, no person shall cause, suffer, allow or permit fugitive dust to be emitted in such manner to exceed five (5) minutes per hour or twenty (20) minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in Chapter 1200-3-20. Fugitive emissions from this source shall be determined by Tennessee Visible Emissions Evaluation Method 4.
9. This permit is valid only at this location.

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10. This permit supersedes any previous permits for this facility.
11. The Permittee shall apply for renewal of this permit not less than sixty (60) days prior to this permit's expiration date pursuant to the Division Rule 1200-3-9-.02(3).
12. The SO_2 emission rate shall be determined by using the following equation:

$$\text{SO}_{2(\text{lb} / \text{hr})} = \frac{\text{GPM}}{\text{HPM}} \times \frac{1}{1000} \times f \times (S) \text{ in pounds per hour, where}$$

GPM = Gallons per month of fuel oil used,

HPM = Hours per month of source operation,

f = **142** for **No.2** fuel oil,

f = **150** for **No.4** fuel oil, and

S = Sulfur content of fuel (in weight percent).

SOURCE 28-0011-01: Batch Mix Asphalt Plant with Cyclone and Baghouse Controls.

13. The stated design capacity of this source is **300** tons per hour. A construction permit must be obtained before exceeding this capacity. The Technical Secretary may require the Permittee to prove compliance with this rate.
14. **No. 2** fuel oil and **No. 4** fuel oil only shall be used as fuels for this source.
15. Production rate for this source shall not exceed **300,000** tons during any interval of 12 consecutive months. Compliance with this requirement may be indicated by the records required by **Condition 23**.

This limitation is established pursuant to Rule 1200-3-9-.02(11)(a) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter from the Permittee dated **LATER**.

16. Compliance with the **0.5** percent sulfur content of **No. 4** fuel oil only be demonstrate by a written statement by the vendor, on an annual basis, guaranteeing in advance that the **0.5** percent by weight limit will not be exceeded or a sulfur content analysis on each shipment of fuel oil shall be provided. These records must be kept available for inspection by the Technical Secretary or a Division representative. These records must be retained for a period of not less than five (5) years.

17. The sulfur content of the fuel oil shall not exceed **0.5** percent by weight.

This limitation is established pursuant to Rule 1200-3-9-.02(11)(a) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter from the Permittee dated **LATER**.

18. Particulate matter emitted from this source shall not exceed **0.04** grain per dry standard cubic foot of stack gases (**12.1** pounds per hour).

This condition is established pursuant to Rule 1200-3-16-.08(3)(a) of the Tennessee Air Pollution Control Regulations.

19. Sulfur dioxide (**SO₂**) emitted from this source shall not exceed **56.3** pounds per hour on a monthly basis.

This limitation is established pursuant to Rule 1200-3-9-.02(11)(a) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter from the Permittee dated **LATER**.

20. Emissions from this source not covered by **Conditions 7** and **8** shall not exhibit greater than twenty (**20**) percent opacity as determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A. (**6**-minute average)

This condition is established pursuant to Rule 1200-3-16-.08(3)(b) of the Tennessee Air Pollution Control Regulations.

21. The Permittee is placed on notice that **Conditions 15, 17, and 19** of this operating permit for this source contain limitations that allow the Permittee to opt out of the major source operating permit program requirements specified in Division Rule 1200-3-9-.02(11). Failure to abide by these limits will not only subject the Permittee to enforcement action by the State of Tennessee, but it may also result in the imposition of Federal enforcement action by the United States Environmental Protection Agency and the loss of being Federally recognized as a conditional major source.

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Compliance with **Conditions 13, 15, 17, and 19** assures that the source will be below the major source applicability thresholds for **particulate matter, sulfur dioxide, carbon monoxide, and nitrogen oxides** of **100 tons per year each**.

This assurance is based on AP-42 Chapter 11, Section 1 (Hot Mix Asphalt Plants, dated **December, 2000**), and Chapter 1, Section 3 (Fuel Oil Combustion, dated **September, 1998**) from which the emission factors were used to calculate emissions as shown below:

Parameter	Based on use of No. 2 fuel oil or No. 4 fuel oil as fuel			
	AP-42 Table	Emission Factor, lb/ton	Emissions without limiting conditions, ton/yr	Emissions with limiting conditions, ton/yr
CO	11.1-5	0.4	525.6	60.0
VOC	11.1-5	0.029	38.1	4.4
NOx	11.1-5	0.12	157.7	18.0

Parameter	Based on use of No. 2 fuel oil as fuel				
	AP-42 Table	Emission Factor, lb/1000 gal	Emissions without limiting conditions, ton/yr*	Emissions with limiting conditions, ton/yr	Remarks
SO ₂	1.3-1	142(S)	109.4	26.6	S is the fuel sulfur content, in percent (by weight).

Parameter	Based on use of No. 4 fuel oil as fuel				
	AP-42 Table	Emission Factor, lb/1000 gal	Emissions without limiting conditions, ton/yr*	Emissions with limiting conditions, ton/yr	Remarks
SO ₂	1.3-1	150(S)	115.6	28.1	S is the fuel sulfur content, in percent (by weight).

*Since the fuel sulfur content is required in order to use the AP-42 emission factors to calculate SO₂ emissions, the emissions with and without limiting conditions are based on the maximum fuel sulfur content allowed by **Condition 17**.

22. A written report stating the compliance status of this source with **Conditions 15, 17, and 19** of this permit shall be submitted by **March 31** of every year having begun in **1995**. This report shall cover the preceding calendar year and shall include the records required by **Condition 23**. This report shall be mailed to the following address:

Tennessee Division of Air Pollution Control
Columbia Environmental Assistance Center
2484 Parks Plus Drive
Columbia, TN 38401

- DAILY LOG for 28-0011-01

Month:

Year:

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(End of Conditions)